



Procurement Center Representative:

An Advocate, A Resource

Octavia Turner

U.S. Small Business Administration
Procurement Center Representative
octavia.turner@nasa.gov



What PCR's Do

- Coordinate with contracting activities
- Review acquisitions
Recommend Set-asides
- Review Bundling Cases
- Review Solicitations
- Support 8(a) Business Development





Small Business Contract Assistance Programs

- Prime Contract Assistance
 - Small business set-aside program
 - Procurement Preference Goaling
 - Size Determination Program
 - Waivers to the Non-Manufacturer Rule
 - Natural Resources Program
 - Certificate of Competency (COC)
- Subcontracting Assistance



PCRs

- Help ensure a fair portion of purchases go to Small Businesses of all types
- represent SBA at major buying activities
- review proposed acquisitions, including bundled procurements
- recommend requirements to be set aside for HUBZone, 8(a) & SB firms
- advise agencies & SBs on SBA programs
- initiate secretarial appeals

FAR Part 19.402



Procurement Programs

- Small business
- Small disadvantaged business (SDB)
- Women-owned small business (WOSB)
- HUBZone small business
- Veteran-owned small business (VOSB)
- Service-disabled VOSB (SDVOSB)

FAR Part 19, Public Laws, Code of Federal Regulations



PCRs and Appeals

- An appeal is a 3 step appellant process:

PCR issues a Form 70, “SBA Recommendation” to contracting officer (CO)

If CO denies, writes a letter of appeal to the Head of the Contracting Activity (HCA)

If HCA denies, PCR forwards to SBA HQ

SBA Administrator appeals to the Agency Secretary or Administrator

FAR Part 19.505



What PCR's Do



- Perform Market Research
- Provide Training
- Perform Surveillance Reviews
- Interface with Others
- Perform Outreach



What PCR's Do

- Attend Training Events
- Promote SBA Programs
- Mediate SB Issues
- Monitor Public Notices
- Counsel small & 'other than small' businesses, Federal Agencies





What PCR's See

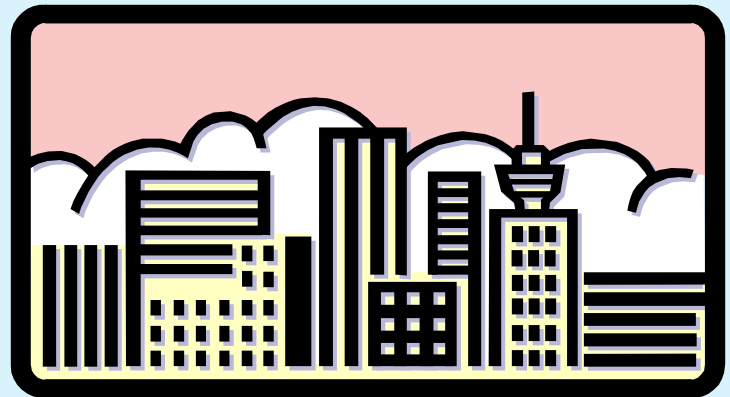
- Small Business Review Form
- Government Estimate
- Sole Source Justifications (J&A)
- Statement of Work
- Acquisition Plan
- Market Survey





What PCRs See

- Procurement Request
- Purchase History
- Synopses
- Source Selection Criteria
- A-76 Information





What PCR's See



- Sensitive Information
- Set-aside appeals
- Certificate of Competency Request
- Subcontracting Plans
- Bid Abstracts



What PCR's Track

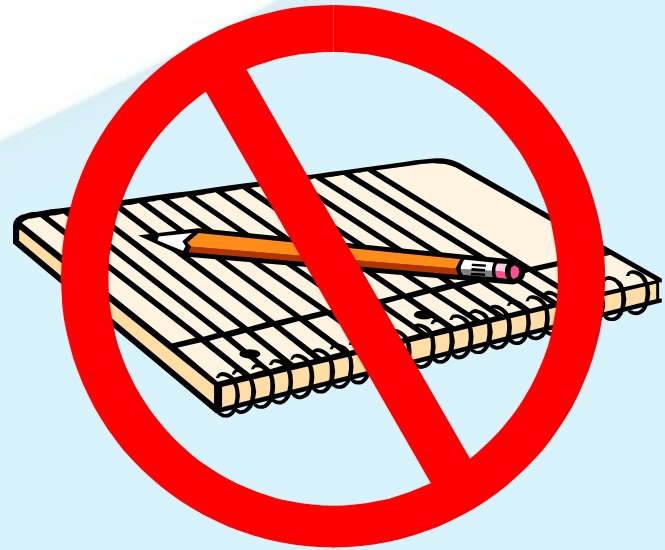
- Buys Reviewed
- Counseling Records
- Subcontracting Plans Reviewed
- SBA Form 70s
- Set-Aside Appeals
- 8(a) recommendations
- Monthly Reports
- Bundling Alerts
- Training and Outreach Reports





What PCRs Protect

- Procurement Sensitive
Proprietary Information
Source Selection Information
Prices
Subcontracting Plans
Classified drawings
For Official Use Only - "FOUO"
- Handling Congressional Inquiries





What PCR's Share

- General Information
- "In the Public Domain"
Forecasts

FedBizOpps Synopses

Solicitations
- Encourage Freedom of Information Act Requests





What PCRs Report

- Monthly report *
 - Set-asides
 - 8(a) awards
 - HUBZone awards
 - SDVOSB awards
 - WOSB awards
 - Full & open awards
- Annual statistics
- Success Stories
- Plan of Operation
- Non-set-asides
- Improper bundling
- Breakout successes

** Reports include both PCR-initiated actions and activity-initiated actions.*



What Other Programs Do PCRs Promote?

- Provide directions and contacts regarding district programs: Loans, Surety Bond Guarantee, and Economic Development



Size Determinations IAW 13 CFR 121

Firm must:

- Meet size standard for NAICS code specified in solicitation
- Self-certify size status
- Be small at time of self-certification

If Questioned, Protest must be:

- Specific to a buy
- Received in a timely manner
- Forwarded to Area Director for formal determination.

Size Determination Specialists are located at SBA Area Offices



Certificates of Competency

*Capacity, Credit, Capability, Competency,
Integrity, Perseverance & Tenacity,
Limitations on Subcontracting.*

When determined to be non-responsible,
a small business is entitled to an
independent review by the SBA.

*Written referrals must be sent to the
SBA Area Office responsible for
the geographic location of the small business.*

<http://www.sba.gov/content/government-contracting-field-staff-directory>



Subcontracting Assistance

SBA's Role in Subcontracting Types of Reviews

- Pre-Award Subcontracting Plan Reviews
SBA's PCRs review subcontracting plans prior to contract award (advisory)
- Post-Award Compliance Reviews
SBA's CMRs monitor goal achievement after contract award



Subcontracting Assistance

Statutory Subcontracting Goals

Small Business Act: Section 15(g)

- Small Business (SB) - negotiable
- Small Disadvantaged Business (SDB) - 5%
- Women-Owned Small Business (WOSB) - 5%
- HUBZone Small Business - 3%
- Veteran-Owned Small Business - negotiable
- Service-Disabled Veteran-Owned SB - 3%



Subcontracting Assistance

Determining the Need for a Subcontracting Plan

- Dollar Threshold:
contract or contract mod is expected to exceed \$650,000 (\$1,500,000 for construction)
 - ❑ Note: \$550,000 was just bumped to \$650,000
- Subcontracting possibilities:
contract appears to offer subcontracting possibilities



Subcontracting Assistance

Determining the Need for a Plan

- Subcontracting plans are **not** required:
 - From small business concerns
 - For personal services contracts
 - For contracts or mods that will be performed entirely outside of the U.S.
 - For contracts that do not contain 52.219-8 (e.g., contracts awarded prior to PL 95-507)



Subcontracting Assistance

Elements of a Subcontracting Plan

- A subcontracting plan must contain goals expressed in both dollars and percentages.
- Other required elements are set forth in the FAR at subpart 19.704 and in the clause at 52.219-9.
- SBA provides a Fact Sheet on Subcontracting that explains goals, flow-down, and reporting requirements.



Subcontracting Assistance

What SBA Can and Cannot Do

- **SBA Can:**
Conduct compliance reviews and SOARS
(Subcontracting Orientation and Assistance Reviews)
- **SBA Cannot:**
Prescribe the amount of subcontracting

Require the prime contractor to use a particular small business

PCRs are Unique!

- Small Business Advocate
- Adversarial Relationships
- Small Business Specialist Support
- Special Authority
- Insider-Outsider





Your SBA PCR:

*An Advocate for all types
of small businesses.*

*A resource for
information and advice.*